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2  
3 UNITED STATES DISTRICT COURT  
4 IN THE EASTERN DISTRICT OF WISCONSIN  
5 -----  
6 JONETTE ARMS,  
7 Plaintiff,  
8 vs. Case No. 2:18-cv-1835  
9 MILWAUKEE COUNTY  
10 (Department on Aging),  
11 Defendant.  
12 -----

13 Zoom Deposition of HOLLY DAVIS  
14 August 20, 2020  
15 2:00 p.m. to 3:32 p.m.  
16  
17

18 (All Parties Appeared Remotely)

19  
20 Reported by Carla J. Van Roo, RPR, CRR  
21  
22  
23  
24  
25

1 EXHIBITS  
2  
3 EXHIBIT NO. PAGE  
4 Exh. 15- Job posting for Direction, Department of Aging 8  
5 Exh. 16- Ms. Davis's CV 9  
6 Exh. 17- Email chain, production 002789 22  
7 Exh. 18- Email chain, production 002629 28  
8 Exh. 19- Email, production 002712 31  
9 Exh. 20- Email chain, production 002713 33  
10 Exh. 21- Email chain, production 002700 33  
11 Exh. 22- Email chain, production 002931 34  
12 Exh. 23- Email chain, production 002572 36  
13 (Exhibits electronically marked.)  
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1 Zoom deposition of HOLLY DAVIS, a  
2 witness in the above-entitled action, pursuant  
3 to the Federal Rules of Civil Procedure,  
4 pursuant to Plaintiff, before Carla J. Van Roo,  
5 Registered Professional Reporter and Certified  
6 Realtime Reporter, in and for the State of  
7 Wisconsin, at the aforementioned location and  
8 date noted on previous page.  
9

10 A P P E A R A N C E S:

11 LAW OFFICE OF ARTHUR HEITZER, by  
12 MS. BRENDA LEWISON  
13 633 West Wisconsin Avenue, Suite 1410  
14 Milwaukee, Wisconsin, 53203  
15 lewisonlaw@yahoo.com  
16 Appeared on behalf of the Plaintiff

17 JACKSON LEWIS, P.C., by  
18 MR. RONALD S. STADLER  
19 330 East Kilbourn Avenue, Suite 560  
20 Milwaukee, Wisconsin, 53202  
21 ronald.stadler@jacksonlewis.com  
22 Appeared on behalf of the Defendant

23 ALSO PRESENT: Ms. Jonette Arms  
24  
25

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BY MS. LEWISON 4

1 TRANSCRIPT OF PROCEEDINGS  
2 (Deposition Exhibit Nos. 15-23 were  
3 marked for identification.)

4 (The following was read into the record by the  
5 reporter: "The attorneys participating in this  
6 deposition acknowledge that I am not physically present  
7 in the deposition room and that I will be reporting  
8 this deposition remotely. The parties and their  
9 counsel consent to this arrangement and waive any  
10 objections to this manner of reporting. Please  
11 indicate your agreement by stating your name and your  
12 agreement on the record.")

13 MS. LEWISON: Hi, this is Attorney  
14 Brenda Lewison on behalf of the plaintiff, and  
15 we agree.

16 MR. STADLER: Ron Stadler on behalf of  
17 Milwaukee County, and we agree.

18 WHEREUPON,

19 HOLLY DAVIS

20 Called for examination, being first duly sworn,  
21 was examined and testified as follows:

EXAMINATION

BY MS. LEWISON:

Q Ms. Davis, where are you sitting right now?

A I'm in my bedroom.

Q Okay. And what is your current home address?

A 1400 College Avenue, No. 3; Racine, Wisconsin,  
53403.

Q All right. Do you have another device with you,

1 like a phone or another computer?

2 **A I have my cellphone here, yes.**

3 Q Could you turn it off, please?

4 **A It's off.**

5 Q It is? Okay.

6 **A Yeah.**

7 Q All right, perfect. Because we don't want any

8 distractions and we don't want any recordings

9 either.

10 **A No.**

11 Q All right. And we are not to have any texting

12 back and forth with anybody during the

13 deposition either; okay? Thanks.

14 All right. If there's a loss of

15 connection, everything stops until we're all

16 reconnected. And I want you to know that there

17 may be instances where opposing counsel will

18 make objections, just like he would if we were

19 in front of a Court. However, because there's

20 no judge here to rule on whether or not you have

21 to answer my question or not, opposing counsel

22 gets to make his objection but then you still

23 have to answer.

24 Do you understand?

25 **A Yes.**

1 Q You'll let me know if you don't understand one

2 of my questions?

3 **A Yes.**

4 Q All right, then.

5 If you need to take a break at any

6 time, just tell me and we'll take a break once

7 you've completed your response to any pending

8 question; okay?

9 **A Okay.**

10 Q You understand that you're under oath?

11 **A Yes.**

12 Q And effectively what you're doing today is

13 testifying?

14 **A Yes.**

15 Q All right. Have you ever had your deposition

16 taken in the past?

17 **A No.**

18 Q Did you do anything to prepare for your

19 deposition today?

20 **A I spoke with Ron for about 30 minutes last week,**

21 **but that was it.**

22 Q All right. And what did you talk about?

23 MR. STADLER: I'll object to that as

24 attorney/client privilege.

25 MS. LEWISON: So it's the County's

1 position that Ms. Davis is a representative of

2 the County?

3 MR. STADLER: Yes, because she was a

4 high-ranking official during the time of her

5 employment.

6 BY MS. LEWISON:

7 Q All right, then.

8 Did you speak with anybody else about

9 your testimony today?

10 **A I reached out to -- what is her name.**

11 Q Corporation Counsel?

12 **A Yeah, Corporation Counsel, just because I was**

13 **alarmed because I hadn't heard anything from**

14 **anybody, and then all of a sudden I was being**

15 **subpoenaed, so I was concerned and then she put**

16 **me in contact with Ron, so that was it.**

17 Q Did you talk with any other Milwaukee County

18 employees regarding your testimony today?

19 **A No.**

20 Q And what is your full name?

21 **A Holly Jane Davis.**

22 Q Do you sometimes go by Holly Samuelson Davis?

23 **A That was my -- "Samuelson" is my maiden name,**

24 **but I don't go by that.**

25 Q Okay. And where did you grow up?

1 **A Racine.**

2 Q And did you graduate from high school in Racine?

3 **A I did.**

4 Q What high school?

5 **A Case High School.**

6 Q And you went to undergraduate school; correct?

7 **A I did.**

8 Q And where did you go to undergraduate school?

9 **A I went to several colleges, but graduated from**

10 **University of Wisconsin-Parkside.**

11 Q And what was your major?

12 **A Sociology.**

13 Q Did you go to graduate school?

14 **A I did not.**

15 Q Have you attended college all after you received

16 your sociology degree?

17 **A No.**

18 (Discussion held off the record.)

19 BY MS. LEWISON:

20 Q Looking at Exhibit 15, does that look familiar

21 to you, Ms. Davis?

22 **A No.**

23 Q So you haven't seen this particular job posting?

24 **A I don't think so, no.**

25 Q Look at the content of it and see whether or not

1 that is or seems similar to the position  
 2 description for which you applied when you  
 3 applied to become the director of the Department  
 4 on Aging.  
 5 **A It does not, to my knowledge, reflect a position**  
 6 **description, but maybe a job posting.**  
 7 Q Okay. Does it sound like the job that you  
 8 applied for?  
 9 **A Yeah.**  
 10 **Is there more of that?**  
 11 Q Yeah, I'm trying to get it to move for me and  
 12 it's not.  
 13 There is the second page.  
 14 **A Yes. Yeah, yes.**  
 15 Q Okay. All right, then.  
 16 And then we're going to look at  
 17 Exhibit 16. And I don't know what the scribbles  
 18 are at the top, that's the way the document was  
 19 provided to me, but is this your resume?  
 20 **A It is.**  
 21 Q And then looking here -- let's see, it's several  
 22 pages. So here's the first page, the second  
 23 page is blank, here's the third page, fourth  
 24 page, and fifth page.  
 25 Is that the resume that you submitted

1 in application for the position as director of  
 2 the Department on Aging?  
 3 **A I would assume so. I don't have my actual email**  
 4 **in front of me, but that looks like my resume.**  
 5 Q Let's go back here. I don't know why it's doing  
 6 this. So the last position, it says Department  
 7 of Children & Families, Milwaukee --  
 8 And I did not touch a thing. I don't  
 9 know what happened here.  
 10 Department of Children & Families,  
 11 Milwaukee, Wisconsin, 2010 to present.  
 12 So was working for the Department of  
 13 Children & Families the last job that you had  
 14 prior to becoming director of the Department on  
 15 Aging?  
 16 **A It was.**  
 17 Q And does your resume accurately reflect your  
 18 duties as the director of the -- let's see here,  
 19 what does it say.  
 20 **A Milwaukee Early Care Administration.**  
 21 Q Okay. And it says that you had 2.2 million as  
 22 your operating budget. Does that sound right,  
 23 sitting here today?  
 24 **A 12.2.**  
 25 Q I'm sorry 12.2, you're right.

1 **A Yes.**  
 2 Q When you operated the Department on Aging, what  
 3 was your budget for that department?  
 4 **A I'd say around \$18 million.**  
 5 Q In thinking back to Exhibit 15, the job posting,  
 6 did that seem to accurately reflect your  
 7 responsibilities as the director of the  
 8 Department on Aging?  
 9 **A No, I think there was so much more than what**  
 10 **that was listed out as. So no, I don't think it**  
 11 **captured everything that went on in the**  
 12 **department. Little did I know.**  
 13 Q So little did you know, you mean there was a lot  
 14 more to the job than you understood when you  
 15 accepted the position?  
 16 **A Yes, as what happens with most jobs.**  
 17 Q All right, then.  
 18 Now, did someone contact you about  
 19 applying for the position of the director of the  
 20 Department on Aging?  
 21 **A No.**  
 22 Q So how did you find out about the job?  
 23 **A I think I found it on Linked-In. I'm pretty**  
 24 **sure that's where I was notified of it.**  
 25 Q Okay. So why were you interested in leaving

1 your job with the Department of Children &  
 2 Families?  
 3 **A Well, the department --**  
 4 **Well, the State was going through a**  
 5 **new process in how they were going to be**  
 6 **administering childcare subsidies, and I had had**  
 7 **a lot of success at the department and I didn't**  
 8 **feel necessarily aligned with the direction that**  
 9 **they were going and I wanted to be -- I knew**  
 10 **that this was a huge undertaking and that the**  
 11 **staff needed someone that was fully aligned and**  
 12 **ready to take on that task, and I knew that that**  
 13 **was not me. And I was ready for a new challenge**  
 14 **in my life, so I thought it was time to move on.**  
 15 Q Now, when you received the offer of the position  
 16 of the director of the Department on Aging, at  
 17 that point you didn't have any experience  
 18 dealing with aging issues; correct?  
 19 **A Not aging issues, but plenty of experience in**  
 20 **working with diverse populations, underserved**  
 21 **populations, at-risk populations.**  
 22 Q Prior to your interview, did you do anything to  
 23 prepare for the interview?  
 24 **A For the Department on Aging?**  
 25 Q I'm sorry, yes.

1 **A** **It's so long ago. We're talking six years ago**  
2 **now. I'm sure I did some background work. I**  
3 **wouldn't go into an interview without doing some**  
4 **research.**  
5 Q And did you talk with anyone from the County  
6 about what was entailed in the job?  
7 **A** **I couldn't say. I don't -- probably what was**  
8 **involved in the interview process, but not**  
9 **involved in the job per se.**  
10 Q Okay. Do you recall who Hector Colon is or was?  
11 **A** **I do.**  
12 Q What position did he hold?  
13 **A** **He was the head of Health and Human Services,**  
14 **the department.**  
15 Q Okay. For the County; right?  
16 **A** **Yes.**  
17 Q And did you talk with him at all before you had  
18 your interview?  
19 **A** **It's a possibility. I don't recall a**  
20 **conversation, but we worked in the same building**  
21 **and I knew Hector, so it's a possibility, but I**  
22 **can't recall a conversation.**  
23 Q When you say you worked in the same building,  
24 what building are you referring to?  
25 **A** **The Coggs building.**

1 Q At the corner of Vliet and 12th?  
2 **A** **Yes.**  
3 Q Now, that was actually -- primarily County  
4 departments were housed there; correct?  
5 **A** **No, it was primarily State.**  
6 Q Primarily State.  
7 **A** **Yup.**  
8 Q So there were some County and some State  
9 departments?  
10 **A** **Correct.**  
11 Q In fact, you -- your offices were on the second  
12 floor; right?  
13 **A** **For my bureau, yes.**  
14 Q And then the Department on Aging was on the  
15 third floor; is that right?  
16 **A** **Correct.**  
17 Q And when you were initially hired as the  
18 director for the department, you were actually  
19 the -- termed the interim director until you  
20 were appointed; correct?  
21 **A** **Yes.**  
22 Q You were appointed, but your appointment was  
23 confirmed by the County Board; correct?  
24 **A** **Correct.**  
25 Q Did you provide any letters of reference prior

1 to your interview?  
2 **A** **I don't recall. I'm sure I did. If I was asked**  
3 **for them I certainly did.**  
4 Q So you don't recall, sitting here today, whether  
5 or not you were asked for letters of reference?  
6 **A** **I don't.**  
7 Q Prior to your interview, had you ever met Luis  
8 Padilla?  
9 **A** **I don't think so.**  
10 Q Had you ever, prior to your interview, met Jim  
11 Sullivan?  
12 **A** **No.**  
13 Q Prior to your interview had you ever met Vi  
14 Hawkins?  
15 **A** **No.**  
16 Q Prior to your interview had you ever met Jon  
17 Janowski?  
18 **A** **I had spoken with Jon on the phone as he was in**  
19 **the beginning stages of the recruitment process,**  
20 **so as far as setting up the interviews and what**  
21 **was needed, but I had not met him face to face**  
22 **or anything like that.**  
23 Q Did you have any kind of phone screen interview  
24 prior to your in-person interview?  
25 **A** **There was a phone screen.**

1 Q Okay. So there was a phone screen and there was  
2 a first round of interviews and a second round  
3 of interviews; correct?  
4 **A** **Correct, and then a third round with County**  
5 **Executive Abele.**  
6 Q Was anybody else in that meeting between you --  
7 that interview, perhaps we should call it,  
8 between you and County Executive Abele?  
9 **A** **Raisa Koltun may have been there. I can't**  
10 **confirm that, though.**  
11 Q But --  
12 **A** **It was not like the rest of the interviews.**  
13 Q What do you mean it wasn't like the rest of the  
14 interviews?  
15 **A** **The first two interviews were with large panels**  
16 **of people, so it was a much more scaled-down**  
17 **interview.**  
18 Q Okay. About how long do you think you met with  
19 County Executive Abele when you were interviewed  
20 for the position?  
21 **A** **I couldn't even say.**  
22 Q An hour?  
23 **A** **Sure, yes.**  
24 Q Then once you became the director of the  
25 Department on Aging, did you meet with the

1 County Executive on a regular basis?

2 **A I was supposed to. I met with Raisa Koltun more**

3 **often than I met with the County Executive, but**

4 **we definitely had check-ins. I would not call**

5 **them regular. They were scheduled regularly, we**

6 **did not meet regularly.**

7 Q Do you recall, over the course of the time you

8 were the director, how many times you met with

9 the County Executive for your check-ins?

10 **A Like, you know, a one-on-one situation?**

11 Q Yeah.

12 **A Yeah. Over the course of the time that I was**

13 **there, so over five years, or four years. I**

14 **couldn't even say. I don't know.**

15 Q Well, when did you start there?

16 **A In September of 2016.**

17 Q And when did you leave?

18 **A The end of 2019, so three years.**

19 Q And when you left in 2019, where did you go?

20 **A A company called WRMA. It's out of Arlington,**

21 **Virginia.**

22 Q And what do you -- or excuse me.

23 Are you still with them?

24 **A Yes.**

25 Q And what do you do for them?

1 **A I'm a senior research manager.**

2 Q And what does that mean?

3 **A So this company gets Federal contracts -- bids**

4 **for and receives Federal contracts. So the**

5 **project that I'm on is in charge of technical**

6 **assistance for all 50 states, territories, and**

7 **tribes on childcare subsidy, so I'm the manager**

8 **of that project.**

9 Q So you provide advice to these various entities

10 about how to provide childcare subsidies?

11 **A Within the CCDF laws, what they can and cannot**

12 **do with the childcare subsidy, yes.**

13 Q Did you like being the director of the

14 Department on Aging?

15 **A Sometimes. I liked the work.**

16 Q But why did you leave?

17 **A Well, I would say firstly, Chris -- County**

18 **Executive Abele was not going to be running**

19 **again, so there was a bit of instability and**

20 **unsurity on my part, having been appointed.**

21 **But secondly, I was -- I was tired of**

22 **the job. I was ready to make a move.**

23 Q Did you believe that you were treated unfairly

24 as the director of the Department on Aging?

25 **A By whom?**

1 Q By anyone.

2 **A I felt that I was not given a chance initially**

3 **by certain people. But as I got my sea legs and**

4 **grew into the job, I felt fine. I mean, there**

5 **were times with the Board of Supervisors -- I**

6 **mean, there are lots of different entities that**

7 **you're dealing with, whether it's constituents,**

8 **obviously staff, the Board of Supervisors, so**

9 **there was an expectation. I think it was a**

10 **surprise to certain people that I got the job**

11 **and I had to -- I had to prove myself in the**

12 **job, which I'm okay with.**

13 Q So do you recall having a conversation with

14 Jonathan Brostoff and telling him that you felt

15 that you were treated unfairly?

16 MR. STADLER: Brenda, I'm going to

17 make an objection as to the relevance of all of

18 this questioning about what happened after she

19 was hired. The issue in this case is Ms. Arms'

20 claims that she was discriminated against, not

21 anything about Ms. Davis and whether she was the

22 best director, the worst director, or she left

23 for a good reason or bad reason. I think you're

24 wasting time by going down this path.

25 BY MS. LEWISON:

1 Q And as I mentioned earlier, he gets to object

2 but you still have to answer.

3 **A I only have had one conversation with Jonathan**

4 **Brostoff as far as I can recall, and I don't**

5 **think I would have said something like that to**

6 **him, but I don't recall.**

7 Q All right. When you started as the interim

8 director, were you instructed to contact Jon

9 Janowski if you had questions about your new

10 duties?

11 **A I don't recall, but that would seem logical.**

12 Q So then were you instructed not to contact

13 Stephanie Sue Stein?

14 **A I don't believe I was instructed not to, but I**

15 **don't know why I would have.**

16 Q But you did; right?

17 **A Eventually she and I would talk.**

18 Q Did anyone tell you not to contact Jonette Arms?

19 **A I don't recall. The problem with that was that**

20 **Jonette -- not the problem, but just the**

21 **situation with that was when I came into my**

22 **position, Jonette was on leave, so I don't -- I**

23 **mean, we don't contact people when they're on**

24 **leave unless it had to do with the leave.**

25 **So if I reached out to Jonette, it**

1 **would have been in that very limited, I think,**  
 2 **capacity, but I don't recall.**  
 3 Q All right. Now, Jon Janowski is somebody who  
 4 eventually became the director of administration  
 5 in the Department on Aging; correct?  
 6 A **Yes.**  
 7 Q And he wasn't your first choice for that  
 8 position; correct?  
 9 A **I don't recall.**  
 10 Q Do you recall having a meeting with staff on or  
 11 about March 9 of 2017 to tell them that Jon had  
 12 been hired as the new director of  
 13 administration?  
 14 A **I recall having -- I don't know what meeting**  
 15 **that was. Could you tell me what meeting that**  
 16 **was?**  
 17 Q I don't know.  
 18 A **I had a meeting with a smaller group of folks.**  
 19 **This is what I'm going to assume we're talking**  
 20 **about from the area agency on aging to tell them**  
 21 **who I had hired for the position.**  
 22 Q And isn't it true that during that meeting you  
 23 informed them that he was not your first choice?  
 24 A **I don't recall that. I don't know why I would**  
 25 **say something like that.**

1 Q Do you know, was there an interview process for  
 2 that position?  
 3 A **There was.**  
 4 Q Do you recall who else applied?  
 5 A **I don't.**  
 6 Q Did you participate in the interviews for that  
 7 position?  
 8 A **Of course.**  
 9 Q And you don't remember anything about the other  
 10 applicants?  
 11 A **I don't.**  
 12 Q Okay. Let's take a look at Exhibit No. 17. So  
 13 this is an email string, and I'm -- it's an  
 14 email string about something that happened,  
 15 actually, while Jonette Arms was still the  
 16 interim director. Let's see here.  
 17 Looking at the bottom of the first  
 18 page, it says -- no, that's your email. We're  
 19 on the second page. Something about how  
 20 "Randy's documents, files, and folders I wrote  
 21 that I suspected he may have deleted documents.  
 22 Given that many folders are empty, my suspicion  
 23 is correct. Can you retrieve all documents  
 24 Randy Kohl may have deleted. The same is for  
 25 Lisamarie Arnold. Her employment ended on

1 February 19 and all her documents in file  
 2 folders that IMSD retrieved are empty. I need  
 3 to obtain all deleted documents."  
 4 And then you write to the service  
 5 desk, "Hello, I'm not sure what the email below  
 6 means. Randy Kohl was an employee as of  
 7 February 19."  
 8 Then you emailed Jon Janowski and say,  
 9 "Can we talk about what this actually means?"  
 10 So do you remember this whole string  
 11 of emails and what this was about?  
 12 A **Not really. I'd like to read it again.**  
 13 Q Sure. Do you want to read from the bottom up?  
 14 A **Yeah, maybe.**  
 15 Q Okay. So this -- where is --  
 16 A **It's hard to see because there's no -- like this**  
 17 **says, "Good morning, I need some clarification**  
 18 **on a response," but it doesn't say who it's**  
 19 **from.**  
 20 Q Well, that's because it's from you.  
 21 A **Okay, down there. Let me see. So I sent it --**  
 22 **"I need some clarification on a request that was**  
 23 **submitted back in February," which is when**  
 24 **Ms. Arms was still there, I'm assuming?**  
 25 Q She was.

1 A **Okay. I restored -- and then the one above that**  
 2 **was Jonette's, okay. And then if you could go**  
 3 **up.**  
 4 **So October 4th I contacted IMSD and**  
 5 **said -- wait.**  
 6 **Oh, so IMSD said this is the request**  
 7 **that they found. And then I said to Jon, "Can**  
 8 **we talk about what this actually means."**  
 9 **So what are you asking me?**  
 10 Q First of all, do you remember this set of  
 11 emails?  
 12 A **I mean, vaguely. Vaguely. I think I was trying**  
 13 **to probably piece together --**  
 14 **I was trying to learn my position with**  
 15 **no help, basically, so I was probably requesting**  
 16 **information. I really am vague on this.**  
 17 Q Do you recall that you had a position available  
 18 as -- hold on here, let me make sure I get it  
 19 right.  
 20 Do you recall that you had a position  
 21 available as the resource center director?  
 22 A **Yes.**  
 23 Q And do you recall that Randy Kohl was an  
 24 applicant for that position?  
 25 A **Yes.**



1 Q Do you recall that Jon Janowski wanted him to  
2 get the position?  
3 A I believe so.  
4 Q So did you learn about Mr. Kohl having deleted  
5 files from the Department on Aging records  
6 during the course of that application process?  
7 A I don't recall when I -- I don't know the  
8 timeframe.  
9 Q So did Mr. Kohl get the resource center director  
10 position?  
11 A He did not.  
12 Q So did Jon Janowski develop the recruitment  
13 process for the resource center director?  
14 MR. STADLER: Brenda, I'm just going  
15 to object again. We're 50 minutes into this  
16 deposition and we haven't talked about anything  
17 relating to the lawsuit yet. This is a waste of  
18 time.  
19 MS. LEWISON: I understand your  
20 objection.  
21 BY MS. LEWISON:  
22 Q Can you please answer the question, please?  
23 A Did Jon Janowski help me with the resource  
24 center director recruitment?  
25 Q Yes.

1 A I would say he probably did.  
2 Q And did he also help you with the recruitment  
3 for the fiscal director?  
4 A Again, I would say he -- I mean, he for sure  
5 participated in the interview process. Is that  
6 what you're asking?  
7 Q I was going to ask that as well, but --  
8 A Yes.  
9 Q Do you know, did he actually participate and  
10 develop any kind of questions and answer key for  
11 either of those positions for the interviews?  
12 A I don't recall. I worked with HR to develop  
13 questions. Those are all vetted through HR, so  
14 I probably asked for former -- prior questions,  
15 although the system I don't think was as tight  
16 as it could have been. I mean, I reached out  
17 to, I think, other directors to --  
18 It was a comprehensive -- I mean,  
19 again, I was learning how the County does their  
20 process, so I reached out to colleagues and HR,  
21 and ultimately the questions are approved by HR  
22 before we go ahead with the interviews.  
23 Q During the time that you were the director of  
24 the Department on Aging, did the County  
25 Executive staff deal with you directly when

1 dealing with issues specific to your department?  
2 A "County Executive staff" meaning who?  
3 Q Any of the County Executive staff: Raisa  
4 Koltun, Claire Zuehlke (phonetic), Jon Janowski.  
5 I mean, he eventually become an employee of the  
6 Department on Aging, but at the time you were  
7 hired I believe he was still part of the  
8 Milwaukee County Executive staff.  
9 Did you interview any of those folks?  
10 A Yes. Raisa Koltun was chief of staff, so I met  
11 with her regularly and had a lot of conversation  
12 with her as I tried to sort through my new job.  
13 Q Any of those people contact your staff without  
14 letting you know?  
15 A I don't know.  
16 Q So sitting here today, you can't think of any  
17 times where Claire Zuehlke (phonetic), for  
18 example, contacted Vonda -- what was her last  
19 name?  
20 A Nyang.  
21 Q Nyang.  
22 A I don't recall that. I mean, it wouldn't be  
23 usual, I don't think, if Claire had a question  
24 about the Commission on Aging. I mean, it  
25 wouldn't be unusual, probably, for her to reach

1 out to Vonda.  
2 Q But you don't have any recollection, sitting  
3 here today, of that having happened?  
4 A No.  
5 Q Let's look at these exhibits. So this is  
6 another email string.  
7 A Okay.  
8 Q So starting at the bottom, it looks like it's an  
9 email to Susan Chase, or maybe it's from Susan  
10 Chase.  
11 A Can we up the percentage on this? It's so tiny.  
12 (Discussion held off the record.)  
13 THE WITNESS: I would like to take a  
14 break when we're done with this one.  
15 BY MS. LEWISON:  
16 Q Okay. That's fine. All right, then.  
17 So "Here is the letter that was sent  
18 out today." That's Susan Chase.  
19 And then you respond, "So...now what?  
20 Where do we go from here?"  
21 And then Matthew Hanchek says, "For  
22 my/Sue's part, we've determined that her ongoing  
23 absence is not protected under the ADA or FMLA.  
24 That is the extent of my authority on the  
25 matter, and effectively places the employment

1 decision back in your hands. I confirmed that  
2 Jonette is unclassified, and as such, she's an  
3 at-will employee. Luis and his team are the  
4 best resources for supporting you and helping to  
5 execute your decision. Let me know if I can be  
6 of further instance."

7 So based upon his response, was it  
8 your conclusion that the decision to discharge  
9 Ms. Arms or not was up to you?

10 **A Firstly, Ms. Arms was not discharged, so that's**  
11 **not even a question. Secondly, nothing in the**  
12 **County happens unilaterally. There's multiple**  
13 **inputs before a decision is made.**

14 Q Okay. So was --

15 What happened? What was the decision  
16 that was made by you, if any?

17 **A It's hard to know. There was so much back and**  
18 **forth, so I don't know if this is like the**  
19 **final, final decision point. Because from what**  
20 **I remember, Ms. Arms wanted more time, then it**  
21 **came back and said an indefinite amount of time.**  
22 **So the question posed to me was can you wait**  
23 **indefinitely to fill this role. And the answer**  
24 **was no, I can't wait indefinitely. I'm new, I**  
25 **don't have someone in a deputy role, I don't**

1 **have a fiscal director, and I don't have a**  
2 **resource center director, and I can't -- I need**  
3 **someone in that role.**

4 Q So wasn't it, in fact, that her request was that  
5 she didn't know when she could be able to return  
6 to work but that she was asking for leave until  
7 at least March of 2017?

8 **A There was some conversation about that, but then**  
9 **there was another document, I think, that came**  
10 **from her doctor or from an FMLA source, I'm not**  
11 **quite sure. But there was something that said**  
12 **"indefinitely"; and that was the problem, was**  
13 **the "indefinitely" part.**

14 Q And you don't recall that she had -- she had  
15 provided information to the County that she  
16 might be able to return as earlier as January?

17 **A I don't recall that. I don't know.**

18 Q So eventually she did resign; right?

19 **A She did.**

20 Q And then how long did it take for you to find  
21 somebody to fill her role?

22 **A I don't know, when did she resign and when did**  
23 **Jon come into the position? I don't remember.**

24 Q Okay.

25 **A That's how long it took. I don't know what to**

1 **say. I'm not trying to be -- I'm really not**  
2 **trying to be funny about any of this, I just**  
3 **don't remember a lot of this. There was so much**  
4 **that happened in those three years, an unusual**  
5 **amount of activity from start to finish.**

6 **So asking me things -- I'm doing my**  
7 **best, but asking me things that happened at the**  
8 **very, very beginning when I was brand new, I**  
9 **just don't remember a lot of it.**

10 Q All right. So you wanted to take a break, so  
11 why don't we --

12 **A Yes, I'll be right back.**

13 Q -- take five minutes.

14 (Off the record.)

15 BY MS. LEWISON:

16 Q And can you --

17 I'm going to show you what's been  
18 marked as Exhibit 19 -- maybe I'm going to show  
19 you what's been marked as Exhibit 19.

20 So here it says --

21 I believe this is an email from you to  
22 Lori Brown and you copied Raisa Koltun on it.  
23 And you say, "Hi all, After thinking more about  
24 the proposed direction we are going with  
25 Jonette's return, I am going to ask that we wait

1 on sending out any further communication until  
2 Raisa (& possibly Chris) can lay eyes on it and  
3 approve. I would rather wait to be sure that  
4 everyone is all on the same page. Raisa, I've  
5 attached the letter for your review. Thanks for  
6 all of your help Lori - I do truly appreciate  
7 it!"

8 Do you see that?

9 **A Yes.**

10 Q Okay. What was the proposed direction you were  
11 referring to here?

12 **A I can't recall. I would assume it was asking**  
13 **Ms. Arms to come back to work.**

14 Q Do you know whether or not Mr. Abele actually  
15 had any input to this whole process?

16 **A I don't know. I have no idea.**

17 Q Do you believe that whatever it was -- whatever  
18 action you were going to be taking Raisa Koltun  
19 had approved of?

20 **A Had approved of it? Is that what you said?**

21 Q Yeah.

22 **A Yes, I would assume so. I don't know. Yeah, I**  
23 **would assume so.**

24 Q It says the attachment is "Resig in Absentia  
25 Arms October 2016." What was that, if you



1 recall?

2 **A I would assume that it was a letter stating that**

3 **she needed to come back to work within a**

4 **specified time or we would consider her resigned**

5 **in absentia.**

6 MS. LEWISON: Carla, can you bring up

7 Exhibit No. 20.

8 BY MS. LEWISON:

9 Q All right. And Ms. Davis, it appears that this

10 is the letter that would have been the

11 attachment to Exhibit No. 19? Do you think it

12 was?

13 **A I don't have any inclination what that --**

14 **No, I'm not going to say that. I**

15 **don't know what it is.**

16 Q Okay. But it is a letter from you to Ms. Arms

17 about resignation in absentia; right?

18 **A It is.**

19 MS. LEWISON: Ms. Van Roo, can you

20 pull up Exhibit 21.

21 BY MS. LEWISON:

22 Q So here you are, the top of Exhibit No. 21,

23 saying, "I would have NO idea how to run that

24 workgroup." From the email below it appears

25 that it's a workgroup related to underserved

1 populations. "Who is on it? Can it be

2 rescheduled? Is there documentation of what's

3 happened in the past? Is it critical that we

4 meet in the next few months?"

5 Is this an example of one of those

6 things where you just had nobody to provide you

7 with any guidance about what it was that you

8 needed to do?

9 **A Yes.**

10 Q Sitting here today, do you know what the --

11 **A I'm sorry, you blanked out.**

12 (Zoom connection lost, off the record.)

13 BY MS. LEWISON:

14 Q Sitting here today, do you know what the

15 Underserved Populations Workgroup is?

16 **A I was not involved with that workgroup.**

17 Q Okay. All right.

18 Exhibit 22, if you go to page 2, you

19 will see that it's an email from Tom Hlavacek to

20 you, Ms. Davis, saying "Hi Holly - Hope all is

21 well. I heard that Jonette has officially

22 resigned - good news right?"

23 And then looking at the bottom of

24 page 1 you say, "Yes...she has resigned, now we

25 can at least move forward. If you know anyone

1 that might be good, let me know?"

2 So were you relieved when Jonette Arms

3 resigned?

4 **A I would have been relieved if Jonette would have**

5 **come back to work too. I just needed help. All**

6 **I needed was someone in the position.**

7 Q And he recommends Jill Knight?

8 **A Uh-huh.**

9 Q So did you hire Jill Knight?

10 **A No.**

11 Q Did you try to hire Jill Knight?

12 **A I don't believe so. I don't remember who was in**

13 **the interview process. I don't remember who**

14 **applied, so...**

15 Q Why did you go through an interview process

16 rather than just appointing somebody?

17 **A Because there would have been large scrutiny,**

18 **which there was anyway surrounding the position,**

19 **so I wanted to -- plus I didn't --**

20 **I was new to the department. I wanted**

21 **to understand who folks were, where they were**

22 **coming from, what kind of applicants I might**

23 **have. So there's nothing wrong with going**

24 **through an interview process. It seems more**

25 **safe to do than not.**

1 Q All right. Then looking at Exhibit No. 23, this

2 is an email from someone, I don't know who

3 "czyks8" is, but it's to you and many other

4 people. I think they must have hit "Reply all"

5 to your earlier email, because you're informing

6 them that Ms. Arms had resigned.

7 But this person says "Sad to hear.

8 Jonette's knowledge will be hard to replace."

9 Do you see that?

10 **A Yes.**

11 Q Did you hear from other people that Jonette Arms

12 would be a loss to the -- or was a loss to the

13 Department on Aging?

14 **A I don't recall specifics, but I'm sure I did.**

15 Q Did you hear from anyone that they were glad to

16 see her go?

17 **A I'll say the same response. I don't remember**

18 **specifics, but I'm sure I did.**

19 Q In terms of the people who were glad to see her

20 go, do you recall anything that they told you

21 about why they were glad to see her go?

22 **A No, I don't recall specifics of why anyone was**

23 **or wasn't glad to see her go.**

24 Q You were aware that she had filed a

25 discrimination suit against -- or complaint

1 against the County; right?

2 **A At some point for sure.**

3 Q Do you remember whether that was before or after

4 you sent her the letter telling her that if she

5 did not return by November 1st she would be

6 considered resigning in absentia?

7 **A I have no idea timeframe on that. I couldn't**

8 **even say. I really couldn't.**

9 Q Ms. Davis, how would you describe your race?

10 **A Black.**

11 Q What race or races are your parents?

12 **A My parents are both white, because I'm adopted.**

13 Q And what did they do, if anything, to try to

14 integrate you into the African-American

15 community in Racine?

16 **A Okay, I honestly don't know what this has to do**

17 **with anything how my parents raised me. This**

18 **is --**

19 MR. STADLER: Brenda, I'm going to

20 offer an objection. You're being far too

21 intrusive on a witness on an issue that has no

22 relevance in this case, and I think it's purely

23 harassment --

24 THE WITNESS: It's disgusting,

25 actually.

1 MR. STADLER: -- for you for ask these

2 types of questions of a witness.

3 BY MS. LEWISON:

4 Q I understand your objection--and I understand

5 your objection as well, Ms. Davis--but I am

6 sorry, I have to ask these questions.

7 Being black is more than a matter of

8 race. It's a matter of culture as well.

9 **A Oh, the white woman is going to tell me that**

10 **being black -- what being black is about.**

11 Q I'm a representative for my client, and I'm sure

12 she would --

13 **A And she is representative of all black people in**

14 **America too; right? This is a really triggering**

15 **question to me. I have spent my entire life**

16 **having to defend myself to white people and to**

17 **black people. I find this offensive. It's no**

18 **one's business what my parents -- how my parents**

19 **raised me. Sorry.**

20 Q So you're refusing to answer and if I want an

21 answer to that question I would have to do a

22 motion to compel?

23 **A Whatever that means.**

24 Q A motion to compel can provide me with an order

25 from the Court that you answer the question.

1 **A Okay, go ahead and do that.**

2 MR. STADLER: We'd be happy to address

3 that with the Court, Brenda.

4 MS. LEWISON: Okay. All right, then.

5 Let me double-check and see if I have

6 any other questions.

7 Tell you what, let's take five, I'll

8 consult with Ms. Arms and see what she has to

9 say.

10 (Off the record.)

11 MS. LEWISON: I don't have any more

12 questions.

13 Do you have any questions,

14 Mr. Stadler?

15 MR. STADLER: I have none.

16 MS. LEWISON: All right, then, I think

17 we have concluded our deposition for today.

18 (Whereupon, the proceedings concluded

19 at 3:32 p.m.)

20

21

22

23

24

25

1 STATE OF WISCONSIN )

2 ) SS:

3 MILWAUKEE COUNTY )

4 I, Carla J. Van Roo, Registered

5 Professional Reporter and Notary Public in and

6 for the State of Wisconsin, do hereby certify

7 that I have carefully compared the foregoing

8 pages with my stenographic notes, and that the

9 same is a true and correct transcript.

10 I further certify that I am not a

11 relative or employee or attorney or counsel of

12 any of the parties, or a relative or employee of

13 such attorney or counsel, or financially

14 interested directly or indirectly in said

15 action.

16 Dated at Milwaukee, Wisconsin, on this

17 \_\_\_\_\_ day of \_\_\_\_\_, 2020.

18

19 -----

20 Carla J. Van Roo

21 Registered Professional Reporter

22 Certified Realtime Reporter

23 Notary Public

24

25 My commission expires April 26, 2024.

<b>BY MS. LEWISON:</b> [11] 4/19 7/6 8/19 19/25 25/21 28/15 31/15 33/8 33/21 34/13 38/3 <b>MR. STADLER:</b> [9] 4/12 6/23 7/3 19/16 25/14 37/19 38/1 39/2 39/15 <b>MS. LEWISON:</b> [8] 4/9 6/25 25/19 33/6 33/19 39/4 39/11 39/16 <b>THE WITNESS:</b> [2] 28/13 37/24	<b>31</b> [1] 3/8 <b>33</b> [2] 3/9 3/10 <b>330</b> [1] 2/15 <b>34</b> [1] 3/11 <b>36</b> [1] 3/12 <b>3:32</b> [2] 1/15 39/19 <b>4</b> <b>4th</b> [1] 24/4 <b>5</b> <b>50</b> [2] 18/6 25/15 <b>53202</b> [1] 2/16 <b>53203</b> [1] 2/12 <b>53403</b> [1] 4/24 <b>560</b> [1] 2/15 <b>6</b> <b>633</b> [1] 2/12 <b>A</b> <b>Abele</b> [5] 16/5 16/8 16/19 18/18 32/14 <b>able</b> [2] 30/5 30/16 <b>about</b> [29] 6/20 6/22 7/8 11/18 11/22 13/6 16/18 18/10 19/18 19/21 20/9 21/11 21/20 22/9 22/14 22/19 23/9 23/11 24/8 25/4 25/16 27/24 30/8 31/2 31/23 33/17 34/7 36/21 38/10 <b>above</b> [2] 2/2 24/1 <b>above-entitled</b> [1] 2/2 <b>absence</b> [1] 28/23 <b>absentia</b> [4] 32/24 33/5 33/17 37/6 <b>accepted</b> [1] 11/15 <b>accurately</b> [2] 10/17 11/6 <b>acknowledge</b> [1] 4/5 <b>action</b> [3] 2/2 32/18 40/15 <b>activity</b> [1] 31/5 <b>actual</b> [1] 10/3 <b>actually</b> [8] 14/3 14/18 22/15 23/9 24/8 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28/8 34/23 <b>brand</b> [1] 31/8 <b>break</b> [4] 6/5 6/6 28/14 31/10 <b>BRENDA</b> [6] 2/11 4/10 19/16 25/14 37/19 39/3 <b>bring</b> [1] 33/6 <b>Brostoff</b> [2] 19/14 20/4 <b>Brown</b> [1] 31/22 <b>budget</b> [2] 10/22 11/3 <b>building</b> [4] 13/20 13/23 13/24 13/25 <b>bureau</b> [1] 14/13 <b>business</b> [1] 38/18 <b>but</b> [39] 5/22 6/21 7/24 8/9 9/6 9/19 10/4 12/19 13/8 13/20 13/21 14/22 15/21 16/11 17/3 18/16 18/21 19/3 20/2 20/6 20/11 20/14 20/16 20/20 21/2 23/18 26/7
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